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March 20, 2017

VIA ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Lopez Meneses, et al. v. Wyeth, Inc., et al., 15 Cv. 09645 (JGK)

Dear Judge Koeltl,

This firm represents the Plaintiffs in the above-referenced FLSA action. I write to request that the Court permit the parties more time to complete depositions in this matter. The parties have engaged in extensive settlement discussions with the help of Magistrate Judge Pittman. Unfortunately, no settlement has been reached.

My office has been eager to commence depositions in this matter. We have not been able to schedule dates. Counsel for the plaintiffs has advised that he is available to depose the plaintiffs on March 31. My clients are available to be deposed on that date. (Mr. Benson also advised that he might be available on March 24. My clients are also available on that date.)

Although my clients have confirmed availability to be deposed, Mr. Benson has not confirmed dates for the depositions of the defendants. My office is available most days in April (with the exception of April 11 and 12 due to the Passover holiday). In light of the need to schedule the defendants' depositions, I respectfully request that the date to complete depositions be extended to April 28, 2017 (the same date as the end date for discovery).

I have conferred with counsel for the defendants who consents to the relief requested.

Respectfully,

Steven B. Ross

Steven B. Ross, Esq.